



Global Crossing®

Michael J. Shortley, III

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FCC Mail Room

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BY OVERNIGHT DELIVERY

Enforcement Bureau
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD. 20743

DOCKET FILE COPY ORIGINAL

**Re: EB Docket No. 06-36
CPNI Certification of Global
Crossing Telecommunications, Inc.**

Dear Sir or Madam:

Enclosed for filing please find the original of Global Crossing's certification of its compliance with the Commission's CPNI regulations.

If there are any questions, please do not hesitate to contact the undersigned.

Sincerely,

CPNI COMPLIANCE CERTIFICATION
Global Crossing Telecommunications, Inc.
and United States Affiliated Entities

1. Pursuant to section 64.2009(e) of the rules and regulations of the Federal Communications Commission ("Commission"), 47 C.F.R. § 64.2009(e), the undersigned, Michael J. Shortley, III, Vice President and Regional General Counsel – North America, hereby certifies that Global Crossing Telecommunications, Inc. and its affiliated United States entities¹ (collectively, "Global Crossing") is in material compliance with the Commission's rules and regulations governing the use and disclosure of customer proprietary network information ("CPNI"), 47 C.F.R. Section 64, Subpart U (§§ 64.2001-64.2009).

2. This certification covers the period – January 1, 2007 through December 31, 2007 – and is based upon the reasonable diligence of the undersigned officer, including a review of the policies and procedures of Global Crossing and interviews with relevant personnel.

3. The balance of this certification constitutes a statement explaining how Global Crossing's operating procedures generally ensure that Global Crossing is in material compliance with the Commission's CPNI regulations.

Section 64.2005 (Use of CPNI without customer approval)

4. Global Crossing does not offer commercial mobile radio services. Global Crossing does offer local and interexchange services. Where a customer subscribes to both categories of service (local and interexchange), Global Crossing is permitted to use that customer's CPNI to market additional services in those categories to such customer. Where a customer subscribes to only one category of service (typically, interexchange because Global Crossing does not offer local service as a stand-alone service offering although it does have an

¹ Global Crossing North American Networks, Inc., Global Crossing Bandwidth, Inc., Budget Call Long Distance, Inc., Global Crossing Local Services, Inc., Global Crossing Telemanagement, Inc. and Global Crossing Telemanagement Virginia, LLC.

extremely limited number of local-only customers), Global Crossing does not utilize a customer's CPNI in one category to sell services in the other category absent customer consent.

5. Global Crossing does not utilize CPNI to identify or track calls made to competing service providers.

Section 2007 (Approval required for use of CPNI)

6. Global Crossing did not, during the current period, use or rely upon oral customer approval for the use of CPNI for which such approval is required.

7. Global Crossing does not have any joint venture partners.

Global Crossing utilizes sales agents to a limited extent. The agency agreements require that the agents utilize CPNI only for lawful purposes, disallow the contractor from using, allowing access to or disclosing CPNI to any other party and to ensure the confidentiality of such information.

Section 2008 (Notice required for use of CPNI)

9. During the current period, Global Crossing did not solicit customer approval for use of CPNI on an opt-out basis.

10. During the current period, Global Crossing did utilize an opt-in method of obtaining approval for the use of CPNI for which customer authorization is permitted, as follows:

a. Global Crossing's retail customer agreements contain a CPNI provision (or form) that permits the customer, by checking the appropriate box, to permit or decline to permit, Global Crossing to utilize that customer's CPNI for which such authorization is permitted.

b. The provision specifies the types of information that constitute CPNI.

c. The provision described the steps that the customer must take (e.g., check the box) to grant or deny access to CPNI; clearly states that a denial of access to CPNI will not impact the provision of any services to which the customer subscribes; the provision is comprehensible and not misleading; clearly legible; of sufficiently large type; and placed in an area readily apparent to the customer.

d. The provision has not been translated into a foreign language.

e. The provision does not contain any statements attempting to encourage a customer to freeze third-party access to CPNI.

11. Global Crossing did not, during the current period, utilize oral notification to obtain any limited, one-time use of CPNI.

Section 64.2009 (Safeguard required for use of CPNI)

12. Global Crossing, through its ethics policy and training, trains its personnel as to when they may or may not use CPNI. All employees are required to take the ethics training and to certify that they understand and will comply with Global Crossing's ethics policy. Violations of the ethics policy are subject to disciplinary measures up to and including termination of employment.

13. During the current period, Global Crossing did not conduct any sales or marketing campaigns that utilized customers' CPNI.

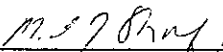
Network Security Agreement

14. Global Crossing is a party to a Network Security Agreement with the Department of Homeland Security, the U.S. Department of Justice, the Federal Bureau of Investigation, and the U.S. Department of Defense. The Agreement was approved by this Commission on October 8, 2003 pursuant to an *Order and Authorization* for transfer of control (DA-03-3121). The

Agreement requires Global Crossing to institute measures to, *inter alia*, "ensure that U.S. communications and related information are secure in order to protect the privacy of U.S. persons and to enforce the laws of the United States." The Agreement also requires Global Crossing to comply with the Commission's CPNI rules. Through its implementation of the Agreement, Global Crossing has implemented various safeguards and measures, including enhanced background screening of personnel with access to CPNI as well as changes to our customer service processes and procedures, to ensure the integrity of CPNI and protect against "pretexting" (an incident described below).

Unauthorized Disclosure

15. Except as described above or under process of law, Global Crossing does not disclose customers' CPNI to third parties without obtaining the affected customer consent. Global Crossing is not aware of any instances during the year where a customer's CPNI was disclosed without customer consent. Accordingly, Global Crossing has not had the occasion to take action against data brokers.



Michael J. Shortley, III

Dated: 28 February, 2008